

July 9, 2001

Mr. Hugh Benz
The Romweber Company
4 South Park Avenue
Batesville, Indiana 47006

Re: 137-14412
Minor Permit Modification to:
Part 70 permit No. 137-6449-00008

Dear Mr. Benz:

The Romweber Company was issued a permit on December 21, 1998 for a stationary wood furniture manufacturing plant. A letter requesting changes to this permit was received on April 10, 2001. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

- (b) Woodworking operations WP1-4, with a maximum rating of 8.26 tons per hour, equipped with one (1) baghouse for particulate control and one (1) cartridge filter controlling particulate matter from only the sanding operations on wood paneling both devices exhausting S/V 20.

The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration and Development Section prior to the start of operation of the new units.

If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Eric Goehl, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7891 to speak directly to Mr. Goehl. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/EG

cc: File - Ripley County
Ripley County Health Department
Air Compliance Section Inspector - D.J. Knotts
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR QUALITY**

**The Romweber Company
4 South Park Avenue
Batesville, Indiana 47006**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T137-6449-00008	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 21, 1998

First Minor Permit Modification 137-14412-00008	Pages Affected: 5, 28, 28a, 29
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	July 9, 2001

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary wood furniture manufacturing plant that produces residential and office furniture.

Responsible Official:	Bruce Rippe, President
Source Address:	4 South Park Avenue, Batesville, Indiana, 47006-0153
Mailing Address:	same
SIC Code:	2511, 2522
County Location:	Ripley
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Major Source, under PSD or Emission Offset Rules;
	Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Fifteen (15) paint booths, identified as SB1-15, fourteen (14) are equipped with spray guns, for wood furniture coating, using dry filters for overspray control and exhausting at fifteen (15) stacks each, identified as S/V 1-S/V 15.
- (b) Woodworking operations WP1-4, with a maximum rating of 8.26 tons per hour, equipped with one (1) baghouse for particulate control and one (1) cartridge filter controlling particulate matter from only the sanding operations on wood paneling both devices exhausting S/V 20.
- (c) One (1) natural gas fired boiler (B2), with #2 fuel oil as back-up, rated at 10.4 mmBtu per hour, exhausting at stack, identified as S/V 2.
- (d) One (1) natural gas fired boiler (B1), using #2 fuel oil as back-up, rated at 24.2 mmBtu per hour, exhausting at a stack, identified as S/V 1.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (b) Woodworking operations WP1-4, with a maximum rating of 8.26 tons per hour, equipped with one (1) baghouse for particulate control and one (1) cartridge filter controlling particulate matter from only the sanding operations on wood paneling both devices exhausting S/V 20.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 16.87 pounds per hour when operating at a process weight rate of 8.26 tons per hour. The baghouse and cartridge filter shall be in operation at all times when the woodworking machinery is in operation.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.4 Particulate Matter (PM)

The baghouse and cartridge for PM control shall be in operation at all times when the woodworking operations (WP1-4) are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking baghouse/cartridge filter stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and

response steps for when an abnormal emission is observed.

The Romweber Company

First Minor Permit Modification: 137-14412

Page 28a of 40

Batesville, Indiana

Reviewer: ERG/EG

OP No. T137-6449-00008

Permit Reviewer: Melissa Groch

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the woodworking process, at least once daily when the woodworking process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.7 Broken or Failed Bag from Baghouse or Failed Filter from Cartridge Filter Detection

In the event that bag or filter failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B- Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B- Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.4 and D.2.5, the Permittee shall maintain records of daily visible emission notations of the baghouse/cartridge filter stack exhaust when exhausting to the atmosphere.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameter during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	The Romweber Company
Source Location:	4 South Park Avenue, Batesville, Indiana 47006
County:	Ripley
SIC Code:	2511, 2522
Operation Permit No.:	137-6449-00008
Operation Permit Issuance Date:	December 21, 1998
Minor Permit Modification No.:	137-14412-00008
Permit Reviewer:	ERG/EG

Permitted Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed a modification application from The Romweber Company relating to the modification of the following emission units and pollution control devices:

Woodworking operations WP1-4, with a maximum rating of 8.26 tons per hour, equipped with one (1) baghouse for particulate control and one (1) cartridge filter controlling particulate matter from only the sanding operations on wood paneling both devices exhausting at S/V 20.

History

On April 10, 2001, The Romweber Company submitted an application to the OAQ requesting to replace an existing wood molding machine and sander within the woodworking operation identified as WP1-4. They also want to add a cartridge filter to their Unit WP1-4 to control only the fine particulate generated by sanders operating on wood paneling. The Romweber Company believes the cartridge filter controls the fine particulate from sanding paneling better than the baghouse. The cartridge filter has the same or better grain loading than the existing baghouse and therefore should not result in any additional particulate emissions. The existing baghouse will continue to control the other woodworking operations. The Romweber Company was issued a Part 70 permit December 21, 1998.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 10, 2001. Additional information was received on April 27, 2001.

Emission Calculations

There are no additional emissions expected from this modification. The throughput to the new replacement wood molding machine and sander will not change.

Potential To Emit of Modification

There are no additional emissions expected from this modification.

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(8) modifications to an existing source that as an existing source has a potential to emit greater than the thresholds under subdivision (4) of this section but that is not a replacement of an entire source, not a reconstruction of an entire process, will not result in an increase of actual emissions or result in a net emissions increase greater than the significant levels in 326 IAC 2-2 or 326 IAC 2-3.

County Attainment Status

The source is located in Ripley County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Ripley County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Ripley County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Individual Facilities

Woodworking Operations:

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, particulate matter emissions from the woodworking operations shall not exceed 16.87 pounds per hour when operating at a process weight rate of 8.26 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Since the potential particulate matter emissions from the woodworking operations before controls are 18.15 pounds per hour, then the baghouse (with an efficiency rating of 99.9%) and the cartridge filter (99.9%) must be operating at all times during the operation of the woodworking processes. Since the 0.02 pound per hour emission rate after controls is less than the allowable emission rate of 16.87 pounds per hour, the woodworking operations are in compliance with 326 IAC 6-3-2.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

- (a) The woodworking operation has applicable compliance monitoring conditions as specified below:
 - (1) Daily visible emissions notations of the woodworking baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent of the time the process is in operation, not counting startup or shut down time. In the case of batch or

discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

- (2) The Permittee shall record the total static pressure drop across the baghouse for the woodworking process, at least once daily when the woodworking process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 to 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-3-2(c) (Process Operations).

Proposed Changes (deletions are noted as strikeouts and inserts are bold)

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Fifteen (15) paint booths, identified as SB1-15, fourteen (14) are equipped with spray guns, for wood furniture coating, using dry filters for overspray control and exhausting at fifteen (15) stacks each, identified as S/V 1-S/V 15.
- (b) ~~Woodworking operations WP1-4, with a maximum rating of 8.26 tons per hour, equipped with one (1) baghouse for particulate control, exhausting at S/V 20.~~ **Woodworking operations WP1-4, with a maximum rating of 8.26 tons per hour, equipped with one (1) baghouse for particulate control and one (1) cartridge filter controlling particulate matter from only the sanding operations on wood paneling both devices exhausting S/V 20.**
- (c) One (1) natural gas fired boiler (B2), with #2 fuel oil as back-up, rated at 10.4 mmBtu per hour, exhausting at stack, identified as S/V 2.
- (d) One (1) natural gas fired boiler (B1), using #2 fuel oil as back-up, rated at 24.2 mmBtu per hour, exhausting at a stack, identified as S/V 1.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: ~~Woodworking operations WP1-4, with a maximum rating of 8.26 tons per hour, equipped with one (1) baghouse for particulate control, exhausting at S/V 20.~~

- (b) **Woodworking operations WP1-4, with a maximum rating of 8.26 tons per hour, equipped with one (1) baghouse for particulate control and one (1) cartridge filter controlling particulate matter from only the sanding operations on wood paneling both devices exhausting S/V 20.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 16.87 pounds per hour when operating at a process weight rate of 8.26 tons per hour. ~~This~~**The baghouse and cartridge filter** shall be in operation at all times when the woodworking machinery is in operation.

D.2.4 Particulate Matter (PM)

The baghouse **and cartridge** for PM control shall be in operation at all times when the woodworking operations (WP1-4) are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking baghouse/**cartridge filter** stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.7 Broken or Failed Bag **from Baghouse or Failed Filter from Cartridge Filter** Detection

In the event that bag **or filter** failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B- Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B- Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.4 and D.2.5, the Permittee shall maintain records of daily visible emission notations of the baghouse/**cartridge filter** stack exhaust when exhausting to the atmosphere.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameter during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Conclusion

The construction of this modification shall be subject to the conditions of the attached Part 70 Minor Permit Modification No. 137-14412-00008.